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May 27, 2020 *VIA ECF*

MEMO ENDORSED

Honorable Sidney H. Stein United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

> RE: <u>United States v. Jason Rhodes</u> 18-CR-887

Dear Judge Stein,

I represent the defendant, Jason Rhodes, in the above-captioned case. Mr. Rhodes is currently scheduled to be sentenced before Your Honor on June 24, 2020. For the reasons detailed below, I respectfully request the Court adjourn Mr. Rhodes' sentencing hearing to a date convenient for the Court in August (with the exception of Fridays).

In light of the health pandemic, our office has not been able to meet with Mr. Rhodes in person to prepare for sentence. All of our office's cases scheduled for June have now been adjourned to August, and I request this adjournment to give our office an opportunity to meaningfully meet with Mr. Rhodes prior to sentencing.

I have communicated with AUSAs Elisha Kobre and Jared Lenow, who consent to an adjournment until August. I therefore request that the sentencing hearing be adjourned to a Monday, Tuesday, Wednesday, or Thursday convenient for the Court in August. This is the defense's second request for an adjournment of sentencing.

The sentencing is adjourned to August 20, 2020, at 2:30 p.m.
Defense submissions are due by August 6, government submissions are due by August 13.

Dated: May 28, 2020

Respectfully submitted,
/s/ Patrick Joyce
Attorney for Jason Rhodes

SIDNEY H. STEIN U.S.D.J.